



**Amanda E. Potter**  
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October 24, 2019

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re:   *Amendment to the Commission's Rules Concerning Market Modification;  
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –  
MB Docket No. 15-71***

Dear Ms. Dortch:

Enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for stations KLTV, KYTX, KFXK, and KETK, located in the Tyler-Longview, Texas DMA, for purposes of carriage in Titus County, Texas.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure



Via FedEx

October 22, 2019

John Fitch  
County Commissioner  
Titus County  
100 West 1<sup>st</sup> Street  
Mt. Pleasant, TX 75455

Dear Mr. Fitch:

We apologize for not responding earlier to your letter of April 8, 2019 requesting a preliminary evaluation of a potential market modification for **Titus County, TX**. We did receive your letter in April, but the email in which it was distributed was unfortunately overlooked at the time. We realized the error when Titus County filed its petition for a market modification with the FCC, and have now completed our preliminary evaluation for you.

DIRECTV's engineering staff was given the Titus County zip codes to evaluate for station **KLTV (ABC)**, **KYTX (CBS)**, **KFXK (FOX)**, and **KETK (NBC)** on our **Tyler-Longview, TX** spot beams, and have found that:

- DIRECTV's SD spot beam covers **ALL** zip codes in **Titus County**
- DIRECTV's HD spot beam covers **ALL** zip codes in **Titus County**

Because Tyler-Longview CBS station, KYTX, had coverage of ALL Titus County zip codes, DIRECTV did not evaluate coverage of Dallas CBS station, KTVT.

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records. Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

# Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.


Station	State	County
KETK	TX	TITUS

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
  - a. The measured performance of the spot beam covering this Television Station's local market.
  - b. Estimated atmospheric effects for reception of the signal.
  - c. Estimated levels of interference.
  - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
  - e. The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
  - a. Signal availability.
  - b. Clear sky signal margin.
  - c. Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:  
☒HD ☒SD Can provide service to all the zip codes associated with this request.\*  
☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.  
☐HD ☐SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.\* The list of unserved zip codes is attached.

\* IMPORTANT: SD coverage will no longer be available after 2019/2020 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/22/19  
Date

  
Signature

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